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May 22, 2023

The Honorable Lisa G. Beckerman  
United States Bankruptcy Court for the  
Southern District of New York  
One Bowling Green  
New York, NY 10004

The Honorable Justice Kannan Ramesh  
The Honorable Justice Anselmo Reyes  
The Honorable Justice Christopher Sontchi  
Singapore International Commercial Court  
General Division of the High Court  
Supreme Court of Singapore  
1 Supreme Court Lane  
Singapore 178879

Re: *In re PT Garuda Indonesia (Persero) Tbk*:  
Case No. 22-11274, U.S. Bankruptcy Court for the Southern District of New York;  
Case No. SIC/OA 5/2022, Supreme Court of the Republic of Singapore

Dear Judge Beckerman and Justices Ramesh, Reyes and Sontchi:

On May 10, 2023 at 8:00 pm EST / Thursday, May 11, 2023, at 8:00 am SGT (GMT +8), the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), together with the Supreme Court of the Republic of Singapore (the “Singapore Court” and, together with the Bankruptcy Court, the “Courts”), held a joint case management conference (the “Conference”) in the above-captioned Chapter 15 case (the “U.S. Proceeding”) and the above-captioned Singapore case (the “Singapore Proceeding,” and together with the U.S. Proceeding, the “Proceedings”). Present at the Conference via Zoom, among others, were counsel for Irfan Setiাপutra and Prasetyo in their capacity as the foreign representatives (the “Foreign Representatives”) of the PKPU proceeding of PT Garuda Indonesia (Persero) Tbk (“Garuda” or the “Debtor”) in the Proceedings, and counsel for Greylag Goose Leasing 1446 Designated Activity Company and Greylag Goose Leasing 1410 Designated Activity Company (collectively, the “Greylag Entities” and together with Garuda, the “Parties”) in the Proceedings.

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At the Conference, the Courts directed the Parties to confer on the preparation of a proposed case management order (“CMO”) concerning a joint hearing for the Proceedings (the “Joint Hearing”) on the pending requests for enforcement of Garuda’s Indonesian PKPU restructuring plan (in the U.S. Proceeding) and recognition of the Foreign Representatives, the PKPU proceeding and the PKPU restructuring plan (in the Singapore Proceeding). The Courts directed the Parties to do so by today, May 22, 2023, or otherwise to provide an update regarding the progress on the discussions regarding the case management order. Consistent with that direction, the Parties write to provide the following status update (the “Status Update”):

As of the filing of this Status Update, the Parties have reached agreement in principle on a number of issues concerning the conduct of a Joint Hearing, but are continuing discussion on a few discrete issues. The current status is summarized below.

- **Timing of Joint Hearing:** Subject to the Parties’ ongoing discussions concerning the scope and timing of any pre-Joint Hearing proceedings, including potential discovery and pre-Joint Hearing motion practice (as mentioned below), the Parties expect that the Joint Hearing would not occur prior to the fall of 2023.
- **Areas of Agreement:** The Parties have also agreed on:
  - The scope of the matters to be resolved through the Joint Hearing;
  - The procedures and mechanics of the Joint Hearing, including:
    - the technological means by which it will be conducted;
    - the process for identification and submissions of exhibits and other written materials;
    - the means by which the witnesses will be examined;
    - the timing and order of opening and closing statements; and
    - the means for providing notice regarding any papers related to the Joint Hearing.
- **Areas of continuing discussion:** The Parties are continuing to discuss the scope and timing of any pre-trial discovery, including as referenced in the *Greylag Entities’ (A) Objection and Reservation of Rights as to Motion for Enforcement of Indonesian PKPU Plan and (B) Request for Case Management Conference and Scheduling Order* (ECF No. 31) filed in the U.S. Proceeding, as well as potential pre-Joint Hearing motion practice.

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The Parties have agreed to continue good faith discussions on these open issues, and have agreed that if they do not reach agreement on a CMO by 12:00 noon EST on Wednesday, May 24 / Thursday, May 24, 2023, at 12:00 am SGT (GMT +8), then each Party will file a proposed CMO with the Courts, in order to apprise the Courts of the Parties' positions sufficiently in advance of the May 25, 2023 status conference. They will then provide a further update to the Courts at the conference.

Respectfully submitted,

By: /s/ Thomas S. Kessler

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